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December 21, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: RM No. 8380

Dear Mr. Caton:

Enclosed please find an original and seven (7) copies of the comments of METS Fans United/Virginia Consumers for Cable Choice submitted in the matter referenced above.

Sincerely,



Samuel A. Simon

/enclosures

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DEC 21 1993

**Before the  
Federal Communications Commission**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**In the Matter of**

# Joint Petition for Rulemaking on Cable Television Wiring

**RM No. 8380**

**COMMENTS OF METS FANS UNITED/VIRGINIA  
CONSUMERS FOR CABLE CHOICE**

Mets Fans United/Virginia Consumers for Cable Choice (METS Fans United/VCCC) submits the following comments in support of the Joint Petition for Rulemaking filed by the Media Access Project, the United States Telephone Association and the Citizens for a Sound Economy Foundation requesting that the Commission initiate a proceeding to determine how cable subscribers may have access to existing cable home wiring for the delivery of competing and complimentary services. Further, METS Fans United/VCCC supports petitioners suggestion that the Commission's telephone inside wiring rules provide a reasonable model for cable television wiring.

METS Fans United/VCCC is an informal, grassroots organization representing over 2,000 consumers in Virginia. METS Fans United/VCCC supports efforts to increase the number and diversity of programming choices available to consumers. Toward this end,

METS Fans United/VCCC has joined with other consumer groups to support Bell Atlantic's challenge to the constitutionality of section 533(b) of the 1984 Cable Act. METS Fans United/VCCC also supports provisions of pending legislation (H.R. 1504, H.R. 3636 and S. 1086) that allow telephone companies to compete with monopoly cable operators for the provision of multichannel video programming within their local service areas.

METS Fans United/VCCC commends the Commission for rules issued earlier this year which give access to cable home wiring to consumers who terminate their cable service. METS Fans United/VCCC encourages the Commission to develop rules that allow all cable television subscribers who have not terminated their service to use cable home wiring to receive video programming from other sources. METS Fans United/VCCC believes that doing so will enhance competition, increase the number of choices available to consumers and lower prices.

In particular, METS Fans United/VCCC believes that consumers should have access to cable home wiring to avoid the unnecessary cost and disruption associated with installing redundant home wiring to receive programming from a competing or complimentary service.

For example, as competition from local telephone companies, DBS, MMDS and other providers develops, consumers may wish to compliment their existing cable service with "a la carte" programming from another provider. Rather than subscribing to HBO and Showtime through their incumbent cable operator, consumers may

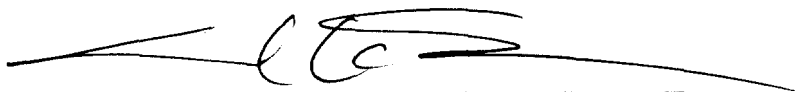
wish to purchase it from a competing provider if, for example, the cost is lower.

Alternatively, subscribers may forego traditional premium movie services such as HBO and Showtime and subscribe to a video-on-demand movie service offered by a company other than the incumbent cable operator. Subscribers could also supplement their cable programming service with additional distant signals or sports programming offered on an "a la carte" basis.

In these instances consumers should be able to use existing home wiring to receive the programming.

For these reasons, METS Fans United/VCCC supports the petition for rulemaking submitted by the Media Access Project, the United States Telephone Association, and the Committee for a Sound Economy Foundation, and asks the Commission to initiate a formal rulemaking to determine how cable subscribers may have access to cable home wiring for the delivery of competing and complimentary services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Simon', is written over a horizontal line.

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Counsel for

METS FANS UNITED/VIRGINIA CONSUMERS  
FOR CABLE CHOICE

December 21, 1993